



October 23, 2008

HARRAH'S
ENTERTAINMENT,
INC.

Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20544

Gary W. Loveman
Chairman of the Board
President & Chief Executive Officer

Dear Chairman Martin, Commissioner Adelstein, Commissioner Copps,
Commissioner McDowell, and Commissioner Tate:

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On behalf of Harrah's Entertainment, Inc. and its over 85,000 employees, I am writing to express our deep concern over the direction the Federal Communications Commission ("FCC") seems to be taking regarding the authorization of White Spaces devices. Harrah's owns or manages casino entertainment facilities in more areas throughout the United States than any other operator in the industry. As the world's leading destination entertainment company, with even greater visitation than Disney, our properties host 90 million visitors per year. In addition to casinos, our facilities across the enterprise feature non-gaming amenities including 40,000 hotel rooms, 390 restaurants, bars and clubs, 62,000 theater seats, 240 retail shops, 40 pools, 7 golf courses, and over 1 million square feet of meeting and convention space. Harrah's has built its reputation on offering world class entertainment venues and convention facilities to its customers. We provide a diverse range of entertainment experiences including Broadway shows, marquee concert artists, signature sporting events as well as facilitating meetings and events for the nation's highest profile corporate convention groups.

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Both the entertainment and convention aspects of our business rely heavily on wireless microphones. Therefore, we have been following closely the FCC's actions in the White Spaces docket, including the testing the FCC has done on White Spaces devices relying on spectrum-sensing technology. Like the rest of the entertainment and other industries that rely on wireless microphones, we were dismayed to read in the press that throughout the FCC's testing of the various spectrum-sensing devices, none seemed to work on a reliable and effective basis. Accordingly, you can imagine our surprise to hear that the FCC is considering adopting on November 4th rules to allow White Spaces devices to operate using spectrum-sensing technology, based on the Executive Summary of the results of a 400-page report issued by the FCC's Office of Engineering and Technology.

Based on our close following of the White Spaces device testing during the last couple of years, it is hard for us to imagine that the FCC could move forward at this time with the adoption of a regulatory scheme that relies on spectrum-sensing technology. However, because of the FCC's rush to adopt rules, we have not been given the time or opportunity to examine for ourselves the 400-pages of testing data results, and comment on the conclusions OET drew from the tests. Therefore, we implore the FCC to not rush to judgment, but instead slow down and give the public an opportunity to comment on this critical element of the FCC's decision-making process.

In addition, we have reviewed an alternative solution offered by Shure Incorporated. We believe there is significant merit in the FCC adopting a solution that does not rely on unproven spectrum-sensing technology, but instead allows users like Harrah's to register the spectrum they use with their wireless microphones on a time and location basis. This would allow for minimally protected channels in local television markets, and provide greater protection for special events including major trade conventions, shows and concerts.

Accordingly, we urge the FCC to grant the public at least 60 days to review and comment on the OET testing results report. In addition, we encourage the FCC to look for a White Spaces solution along the lines of Shure's proposal, and not something that relies on spectrum sensing.

Sincerely,

A handwritten signature in black ink, appearing to read "G. W. Loveman", followed by a long horizontal line.

Gary W. Loveman
Chairman, President and CEO